

## COLUMBIAN RESOURCES CORPORATION

September 13, 1990

Kansas Corporation Commission Conservation Division 200 Colorado Derby Building Wichita, KS 67202-1286

Attention: Jim Hemmen 15-087-20457-00-00

15-087-20453-00-00

RE: A. Noll No. 1-89
Sec 19-8S-20E
Jefferson Co. KS

Domann A No. 1-89 Sec 24-8S-19E Jefferson Co. KS

Dear Jim:

In response to your letter regarding our partial compliance to the Notice of Violation. We stated the wells were not capable of performing the multi-point back pressure test, but filed to substantiate the statement. We request the referenced wells be exempt from the multi-point tests for the following reasons:

## A. Noll No. 1-89

- 1.) If the well is shut-in for build-up prior to conducting the 4-point, the well will log off. The history of the wells in this area show the wells are severally or permanently damaged.
- 2.) The well is severally loaded with water as shown on the enclosed gauge reports. Soap sticks are being used in an attempt to unload the water. A pumping unit was to be installed, but has been canceled due to low gas price. Enclosed is a copy of the letter from the pipeline company showing the price for September and probably for October to be only \$0.75 per MMBTU.
- 3.) The well is just floating the gas sales line pressure. The well is only capable of producing 40-47 MCFD.

## Domann A No. 1-89

- 1.) Same as number one for the A. Noll.
- 2.) A pumping unit was installed in August, with increased gas sales averaging less than 90 MCFD. The well is just floating the gas sales line pressure.
- 3.) The well produces over 26 BWPD which must be hauled.

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For the conditions given above I do not believe a valid 4-point test could be obtained. An attempt to conduct such a test could cause damage to the well and financially strain an already marginally economic well. As an additional consideration, the significant of using an "n" value of 0.5, 0.85, or 1.0, is minimal for these wells. For example, a 0.5, 0.85, and 1.0 give CWHOF for the Domann A of 79 MCFD, 86 MCFD, and 89 MCFD, respectively. Again, please consider exempting these wells from an initial multi-point test.

Just for informational purposes, when economics were run prior to drilling of these wells, a gas price of \$1.12 was used. Since then, the price has decreased to \$0.96 and just recently to \$0.75 per MMBTU. These wells are fast approaching their economic limit.

Sincerely,

COLUMBIAN SERVICES CORPORATION

Stan Brady

Operations Manager

SB/jr

Enclosures

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